

**FMC BioPolymer
Knox County
Rockland, Maine
A-366-70-A-I**

) **Departmental**
) **Findings of Fact and Order**
) **Part 70 Air Emission License**
)

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	FMC Biopolymer
LICENSE NUMBER	A-366-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2099, 2835
NATURE OF BUSINESS	Refined Hydrocolloid Products
FACILITY LOCATION	Crocketts Point, PO Box 308, Rockland
DATE OF LICENSE ISSUANCE	June 28, 2002
LICENSE EXPIRATION DATE	June 28, 2007

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	STACK # (FMC ID#)	UNIT CAPACITY	UNIT TYPE
#1, Lime Unloading	15-1		Process Equipment
#3, Weed Cleaning – shredders, screen, conveyors, bins	15-2		Process Equipment
#4, Perlite Unloading	1A-1		Process Equipment
#5, Tank Vent Filtration System	1A-3		Process Equipment
#6, FID Hydrocolloids Isopropanol Process	2-2, 2-9, 2-6		Process Equipment
#8, Grinder Feed System	3A-4	2,100 lb/hr	Process Equipment
#9, A44 Grinder	3A-5		Process Equipment

System			
#10, ACM 60 Grinder System	3A-6		Process Equipment
#11, Tote Dumper System	3A-7		Process Equipment
#12, Blending Product Conveyor System	3A-3		Process Equipment
#13, Blending Area and Vacuum System	8A-1		Process Equipment
#14, Off Line Feeding System	8A-2		Process Equipment
#15, ACM-10 Fine Grinding	8A-3		Process Equipment
#16, Specialty Blender System	7-1		Process Equipment
#17, Agarose Isopropanol Process	17-1		Process Equipment
#18, Agarose Grinding Process	17-10		Process Equipment
#19, Pilot Plant Area	18-1		Process Equipment
#20, No. 3 Boiler	5-1	85.6 MMBtu/hr	Fuel Burning
#21, No. 4 Boiler	5-1	48.6 MMBtu/hr	Fuel Burning
#22, No. 5 Boiler	5-1	48.4 MMBtu/hr	Fuel Burning
#23, Emergency Diesel Engine	5-5	6.0 MMBtu/hr	Fuel Burning
#24, Parts Cleaner	-	-	Maintenance Equipment
#25, Gasoline Storage Tank	12-4		Storage Tank

FMC BioPolymer has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and subsequent modifications and in Appendix B of Chapter 140 of the Department's Regulations

C. Application Classification

The application for FMC BioPolymer does not include the licensing of increased emissions or the installation of new or modified equipment, therefore, the license is considered to be an Initial Part 70 License issued under Chapter 140 for a Part 70 source. This license supercedes all previous air emissions licenses issued to FMC BioPolymer by the Department. All previously issued air licenses are no longer in effect.

II. EMISSION UNIT DESCRIPTION

A. Process Description

FMC BioPolymer manufactures hydrocolloids products including carrageenan and locust bean gum, agarose and other hydrocolloids. The two process systems at the plant are the hydrocolloids process and the agarose process. The hydrocolloids process manufactures carrageenan, clarified locust bean gum and other hydrocolloids. Agarose is manufactured in the agarose process.

Hydrocolloids Description

The raw material for carrageenan is red seaweed. Different types of red seaweed are used to produce carrageenans with different characteristics. The carrageenan process begins with weed cleaning. The dried seaweed is ground and sifted to remove extraneous material such as rocks and shells, and then the seaweed is mixed with water, and pumped to the pasting tanks.

In pasting, the mixture is heated to begin to extract the carrageenan. Process chemicals may be added to assist carrageenan extraction.

The material is then pumped to Building 1 and goes through a series of filtration steps. A light brown liquid, called filtrate, is then pumped to the evaporators. In evaporation, water is removed from the filtrate.

After evaporation, the filtrate is mixed with isopropanol and a carrageenan precipitate is formed. The precipitate, or coagulant, is separated out of the alcohol/water solution. The alcohol/water solution is pumped to distillation where the alcohol is distilled for reuse. The coagulant is then slurried with isopropanol (IPA) in the wash tanks. After the wash tanks the carrageenan alcohol mixture is pumped to a rotary screen where liquid is again separated from the solid carrageenan. The liquid IPA flows to the high drain tank. The coagulant is further pressed to remove more alcohol and is dried.

In drying, vacuum dryers and a belt dryer are used. The vapors from the dryer pass to a vertical condenser, containing coils fed with seawater. The condenser removes most of the liquid which goes to the distillation system. The remaining vapor goes to a packed tower.

The final product is sent to blending where it is ground to a fine powder and formulated to customer specifications.

The same process is used to manufacture clarified locust bean gum and other hydrocolloids. Since the raw material for some of these other hydrocolloids comes pre-processed, the process for certain products begins with the filtration or blending stages as described above. The remaining process is identical.

Agarose Process Description

Raw material for the production of Agarose is agar. Agar is made from seaweed. The process begins by putting the agar into solution with water, heating it with steam, and adding chemicals to modify the agar. The modification involves a separation of agarose and agarpectin from the agar molecule. The solution is then neutralized with acetic acid.

After neutralization, the agarpectin is filtered out of solution using filter press with a filter aid.

The solution is evaporated to reduce the volume, then combined with isopropanol to form a precipitate. The precipitate is washed several times with water and alcohol, and pressed to remove as much liquid as possible. The alcohol and water solutions are distilled to reuse the alcohol. The material is then dried using vacuum dryers. The final material is blended to customer specifications.

B. Emission Units #20, #21 and #22, Boilers No. 3, 4, and 5

No. 3 Boiler, designated as emission unit #20, was manufactured by Union Iron Works with a maximum design heat input capacity of 85.6 MMBtu/hr firing #6 fuel oil, with a maximum sulfur content of 2.0% by weight. The boiler was installed in 1966, prior to the New Source Performance Standards (NSPS) Subpart Dc applicability date. The boiler has Low NOx burners firing #6 fuel oil and propane during startup.

No. 4 Boiler, designated as emission unit #21, was manufactured by Union Iron Works with a maximum design heat input capacity of 48.6 MMBtu/hr firing #6 fuel oil, with a maximum sulfur content of 2.0% by weight. The boiler was installed in 1965, prior to the New Source Performance Standards (NSPS) Subpart Dc applicability date. The boiler has Low NOx burners firing #6 fuel oil and propane during startup.

No. 5 Boiler, designated as emission unit #22, was manufactured by Union Iron Works with a maximum design heat input capacity of 48.4 MMBtu/hr firing #6 fuel oil, with a maximum sulfur content of 2.0% by weight. The boiler was installed in 1963, prior to the New Source Performance Standards (NSPS) Subpart Dc applicability date. The boiler fires #6 fuel oil and propane during startup.

NOx RACT

FMC BioPolymer is in an attainment area for all USEPA designated criteria air pollutants, except ozone for which Knox County is designated as marginal nonattainment. Chapter 138 of the Maine Air Regulations requires that every source which has the potential to emit equal or greater than 100 tons per year

apply NOx RACT to their applicable NOx emissions. Chapter 138 NOx RACT requirements are incorporated into this initial Part 70 license.

Streamlining

FMC BioPolymer accepts streamlining for opacity requirements for boilers No. 3, 4, and 5. Chapter 101, Section 2(D) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Periodic Monitoring

Periodic monitoring for boilers No. 3, 4, and 5 shall consist of maintaining fuel use records for all boilers and periodic stack testing for particulate matter and nitrogen oxide emissions for Boiler #3. Stack testing for Boilers #4 and #5 shall be performed when requested by the Department.

C. Stationary Internal Combustion Engine

Unit Size and Age

The emergency diesel engine, emission unit #23, was manufactured by Caterpillar and installed in 1993 and has a design capacity of 6.0 MMBtu/hr.

In order to comply with NOx RACT requirements, FMC BioPolymer accepts license restrictions of hours of operation for the emergency diesel engine to maintain NOx emissions less than 10 tons per year, and thus exempts the unit from any requirements for NOx emission control.

Streamlining

Opacity

FMC BioPolymer accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Sulfur Dioxide

FMC BioPolymer accepts streamlining for sulfur dioxide requirements. Chapter 106 (requiring a sulfur content less than 2.0% by weight when burning fuel oil) and BPT requirements are applicable. The BPT sulfur dioxide limit of 0.05% or less is more stringent. Therefore, only the more stringent BPT requirements are included in the order section of this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping of hours of operation.

Based on the type of fuel used and hours of operation of the SICE unit and operating in a manner consistent with good air pollution control practices, it is unlikely the SICE unit will exceed the opacity limit. Therefore, periodic monitoring by the source in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

D. Emission Units #1 - #19, Process Equipment

The following process equipment are controlled to prevent particulate matter emissions and volatile organic compound emissions.

Source #, Description	Control Equipment, % Efficiency, Pollutants Controlled
#1, Lime Unloading	Baghouse, 99%, (PM)
#3, Weed Cleaning – shredders, screen, conveyors, bins	Baghouse, 99%, (PM)
#4, Perlite Unloading	Baghouse, 99%, (PM)
#5, Tank Vent Filtration system	Cyclone, 80%, (PM)
#6, Hydrocolloids Isopropanol Process	Carbon Bed Absorption, Two Packed Absorption Towers, 85% (VOC) & Belt Dryer Cyclone (PM)
#8, Grinder Feed System	Baghouse, 99%, (PM)
#9, A44 Grinder System	Baghouse, 99%, (PM)
#10, ACM 60 Grinder System	Baghouse, 99%, (PM)
#11, Tote Dumper System	Baghouse, 99%, (PM)
#12, Blending Product Conveyor System	Baghouse, 99%, (PM)
#13, Blending Area and Vacuum Systems	2 Baghouses, 99%, (PM)
#14, Off Line Feeding Systems	Baghouse, 99%, (PM)
#15, ACM-10 Fine Grinding	Baghouse, 99%, (PM)
#16, Specialty Blender System	Baghouse, 99%, (PM)
#17, Agarose Isopropanol Process	Packed Absorption Tower, 90%, (VOC)
#18, Agarose Grinding process	Baghouse, 99%, (PM)
#19, Pilot Plant Area	Packed Absorption Tower, 90%, (VOC)

Streamlining

Opacity

FMC BioPolymer accepts streamlining for opacity requirements. Chapter 101, Section 2(C) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Particulate Matter Emissions

FMC BioPolymer accepts streamlining for particulate matter requirements. Chapter 105, which limits particulate matter emissions from general process equipment, is applicable, however, meeting the BPT opacity limits in this license meets Chapter 105 requirements.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping of fabric filter maintenance, and all process and control equipment malfunctions that might increase emissions.

Based on maintenance and the use of baghouses and operating in a manner consistent with good air pollution control practices, it is unlikely the process equipment will exceed the opacity limits. Therefore, periodic monitoring for opacity in the form of visible emissions is not required. However, the EPA and the State may perform its own testing or require the source to perform testing, and either EPA and/or the State may take enforcement action for any violations discovered.

VOC RACT

Chapter 134 of the Maine Air Regulations requires facilities that have the potential to emit forty (40) tons or more of VOC per calendar year apply VOC RACT (Reasonable Available Control Technology) to their applicable VOC emissions. Chapter 134 VOC RACT requirements are incorporated into this initial Part 70 license.

In accordance with MEDEP Chapter 134 Section 3(A)(1), Option A, the owner or operator must install and operate a system to capture and control VOC emissions such that the total VOC emissions do not exceed, on a daily basis, fifteen (15) percent of the uncontrolled daily VOC emissions. FMC BioPolymer's use of packed towers and carbon adsorption equipment meets the requirements of Chapter 134 by controlling VOC emissions such that the VOC emissions do not exceed, on a daily basis (15) percent of the uncontrolled daily VOC emissions.

MACT/Chapter 137

IPA is not listed as a hazardous air pollutant (HAP) under 112(b) of Clean Air Act. Furthermore, IPA is considered a HAP under Chapter 137 of the Department's regulation only to the extent it is used in strong acid manufacturing processes. Because FMC does not use IPA in strong acid manufacturing processes, FMC's IPA emissions are not HAPs under Chapter 137. Because FMC does not operate any other significant sources of HAPs, it is not a major HAP source.

Periodic Monitoring

FMC proposed to demonstrate and document compliance of 85% control efficiency, utilizing a material balance approach. Records will be kept including the amount of IPA purchased annually, daily 24 hour wastewater composite analysis, and the amount of IPA used in coagulation. VOC control efficiency is based on records of IPA used, purchased and lost to wastewater and mass balance calculations. Compliance is certified based on a monthly recordkeeping program, as outlined below.

VOC (Isopropanol) Emissions and Control Efficiency Calculations

The isopropanol (IPA) emissions calculations are based on a process mass balance to account for total emissions to the atmosphere. This accounts for all point source and fugitive losses.

There are two separate processes within the facility, Hydrocolloids (includes the Pilot Plant), and Agarose. Total emissions and control efficiency are calculated for the facility.

The calculations are based on the total amount of IPA used, i.e., cycled through the processes, and the amount of IPA purchased throughout the year, adjusted for beginning and ending inventories. Also, since Isopropanol is purchased at a concentration of 99% all purchases are converted to 99% concentration for the calculations.

To determine compliance with the 85% facility-wide VOC control efficiency requirement of Chapter 134, VOC control efficiency for the FMC facility is determined by comparing the total amount of VOC emissions to the total amount of IPA used. This is expressed as a percent, as follows:

$$\text{VOC Control Efficiency \%} = \frac{\text{Total IPA Usage}^{(1)} - \text{Total VOC Emissions}^{(2)}}{\text{Total IPA Usage}^{(1)}} \times 100$$

Each of the inputs to this equation is further described below.

(1) Total IPA Usage

The IPA is used as a precipitating agent and is recycled for reuse by distillation in closed loops.

Total IPA usage is measured by the total amount of isopropanol cycled through the processes. The amount used is measured by a flow meter in the hydrocolloids

process and a flow meter in the agarose process. The flow meters in each process are located just prior to the point where the IPA is mixed with the process liquor (filtrate). At this point the IPA solution is approximately 80% IPA and 20% water. To convert to 99% IPA the total flow, as measured by the flow meter, is multiplied by 0.8 to determine the IPA flow.

IPA usage = Total flow x 0.8

(2) Total VOC Emissions

The total amount of VOC emissions from the facility is determined by calculating the total amount of IPA lost and subtracting the amount of IPA discharged to the wastewater stream.

Total VOC Emissions = IPA lost^{(2)(A)} – IPA discharged to waste water^{(2)(B)}

(2)(A) IPA Lost

The amount of IPA lost is determined by the actual number of gallons purchased, at a 99% concentration, adjusted for the beginning and ending inventories.

IPA Lost = Gallons purchased + beginning inventory gallons – ending inventory gallons

(2)(B) IPA Discharged to Waste Water

A small amount of IPA is discharged to the waste water system each day. This loss is quantified daily using a gas chromatograph and extrapolation.

FMC will calculate the VOC control efficiency on a calendar month basis. Due to the difficulty in accurately measuring the inventory at any one time because of the many process variables (e.g., IPA concentrations, process temperatures, amount in process) daily calculations would not be sufficiently accurate for reporting purposes. Accuracy is improved when done over a 30-day period.

Usage will be recorded daily and monthly totals will be used for the calculation. IPA lost and VOC emissions can only be accurately determined monthly.

E. Degreaser Units

FMC BioPolymer operates parts cleaners which are subject to the requirements of MEDEP Chapter 130. FMC BioPolymer shall operate and maintain the degreasers in accordance with the requirements set forth in Chapter 130, including equipment and operation standards and compliance certification and recordkeeping procedures.

Periodic Monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

F. Facility Emissions

Total Allowable Annual Emissions for the Facility *

(Used to calculate the annual license fee)

Pollutant	TPY
PM	150.0
PM ₁₀	150.0
SO ₂	1,570.0
NO _x	322.5
CO	25.0
VOC	434.0

*These totals are based on licensed allowed emissions for FMC BioPolymer's boilers, pilot plant, and isopropanol usage. Fugitive emissions from unquantifiable process sources are not included.

III. Air Quality Analysis

Modeling analysis performed by Department staff in 1980 demonstrated that with 100% of formula GEP stack height, emissions from FMC BioPolymer, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-366-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to FMC BioPolymer pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact

accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Standard Statements

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege.
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

- (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 15, 1997.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Boilers #3, #4 and #5	40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial Steam Generating Units	Commenced construction prior to June 9, 1989.
Boiler #3	Chapter 138 § 3(B)(1)	lb/MMBtu emission limits in Chapter 138	Boiler meets NO _x RACT with the use of low-NO _x burners
Hydrocolloids IPA Process (Emission Unit #6) and Agarose alcohol process (Emission Unit #17)	40 CFR Part 60, Subpart NNN	Standards of Performance for VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations	Standards do not apply for FMC's Hydrocolloids isopropanol use, recovery, distillation and reuse processes
Facility	40 CFR Part 63	MACT Standards for sources of hazardous air pollutants	IPA is not a HAP. FMC is not a major HAP source.

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- (a) Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
- (b) Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

- (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
- (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

Standard Conditions

- (9) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);
- (10) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;
- (11) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request;
- (12) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (13) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions;
- (14) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring

- sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
- (15) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.
- (16) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - (i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - (ii) to demonstrate compliance with the applicable emission standards; or
 - (iii) pursuant to any other requirement of this license to perform stack testing.
 - (b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (c) submit a written report to the Department within thirty (30) days from date of test completion.
- (17) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- (a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance

with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- (b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - (c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (18) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
- a. The licensee shall notify the Commissioner within 48 hours of a violation in emission standards and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
 - b. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- c. All other deviations shall be reported to the Department in the facility's semiannual report.
- (19) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.
- (20) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (21) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;

SPECIAL CONDITIONS

- (22) Oil Boilers No. 3, 4, and 5, Emission Units #20, #21, and #22
- A. FMC is licensed to operate Boiler #3 firing #6 fuel oil. [MEDEP Chapter 140, BPT]
 - B. FMC is licensed to operate Boiler #4 firing #6 fuel oil. [MEDEP Chapter 140, BPT]
 - C. FMC is licensed to operate Boiler #5 firing #6 fuel oil. [MEDEP Chapter 140, BPT]
 - D. FMC BioPolymer shall operate fuel meters on Boilers #3, #4 and #5. Records detailing fuel usage in each boiler shall be maintained on a monthly basis, in addition to a 12-month rolling total. [MEDEP Chapter 140, BPT]

- E. FMC BioPolymer shall maintain records of annual #6 fuel use indicating the quantity of fuel consumed (gallons), along with the nitrogen content by weight (demonstrated by purchase records from the supplier, otherwise to be tested at a minimum of once per calendar quarter), and the percent (%) sulfur content of the fuel by weight, and the heat content of the fuel, demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]
- F. FMC BioPolymer shall not exceed an annual #6 fuel oil cap of 10,000,000 gallons per year, based on a 12-month rolling total, demonstrated by fuel meters located on each boiler. [MEDEP Chapter 140, BPT] **Enforceable by State-Only**
- G. The sulfur content of the fuel oil fired in each boiler shall not exceed 2.0% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 106]
- H. FMC BioPolymer may fire propane during start-up, and may otherwise fire #6 or lighter fuel oil in each boiler. [MEDEP Chapter 140, BPT]
- I. FMC BioPolymer shall operate Boiler #3 with low NO_x burners. [MEDEP Chapter 138, NO_x RACT]
- J. FMC BioPolymer shall operate Boiler #4 with low NO_x burners. [MEDEP Chapter 140, BPT] **Enforceable by State-Only**
- K. Annual boiler tune-ups shall be conducted on Boilers #4 and #5 in accordance with Chapter 138, section 3(L). FMC BioPolymer shall maintain records of the tune-up procedures, and the O₂/CO curves or O₂/smoke curve generated during the tune-up. Optimum excess O₂ settings shall be established during the tune-up and periodically verified such that settings remain at the established value. When the setting is high, FMC BioPolymer shall improve the air/fuel mix. [MEDEP Chapter 138, NO_x RACT]
- L. Emissions from Boiler #3 shall not exceed the following limits:

<i>Pollutant</i>	<i>Lb/MMBtu</i>	<i>Origin and Authority</i>	<i>Enforceability</i>
PM	0.20	MEDEP Chapter 103, Section	-
NO _x (<0.45% nitrogen)*	0.50	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
NO _x (>0.45% nitrogen)*	0.55	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>

* denotes the nitrogen content in the fuel.

<u>Pollutant</u>	<u>Lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	17.0	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
PM ₁₀	17.0	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
SO ₂	180	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
NO _x	36.8	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
CO	2.85	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
VOC	0.72	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>

M. Emissions from Boiler #4 shall not exceed the following limits:

<u>Pollutant</u>	<u>Lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.20	MEDEP Chapter 103, Section	-
NO _x	0.50	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>

<u>Pollutant</u>	<u>Lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	9.72	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
PM ₁₀	9.72	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
SO ₂	101.7	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
NO _x	20.9	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
CO	1.62	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
VOC	0.41	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>

N. Emissions from Boiler #5 shall not exceed the following limits:

<u>Pollutant</u>	<u>Lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.20	MEDEP Chapter 103, Section	-
NO _x	0.50	MEDEP Chapter 138	<i>Enforceable by State-only</i>

<u>Pollutant</u>	<u>Lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	9.70	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
PM ₁₀	9.70	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
SO ₂	101.7	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
NO _x	20.8	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
CO	1.62	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>
VOC	0.4	MEDEP Chapter 140, BPT	<i>Enforceable by State-only</i>

O. FMC BioPolymer shall operate each boiler such that the visible emissions from stack #5-1 do not exceed 30% opacity on a six (6) minute block average, for more than two (2) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 140, BPT]

P. FMC BioPolymer shall maintain records of efforts to maximize the performance of the low NO_x burner of Boiler #3. [MEDEP Chapter 140, BPT] **Enforceable by State-only.**

- R. For Boiler #3 compliance with the following limits shall be demonstrated by a stack test in accordance with this license:

<i>Pollutant</i>	<i>Limits</i>	<i>Method</i>	<i>Schedule</i>
PM	lb/MMBtu	Method 5	Once within the term of this license, within one year from date of issuance for Boiler #3.
NO _x	lb/MMBtu	Method 7E	Annually, by May 31 each year

Test Methods are in accordance with 40 CFR Part 60, Appendix A. After two annual NO_x stack tests, FMC BioPolymer may submit a request to reduce NO_x testing to every other year.

[MEDEP Chapter 140, BPT] **Stack testing requirements for NO_x are Enforceable by State-Only.**

(23) **Emergency Stationary Internal Combustion Engine (SICE)**

- A. The emergency SICE unit shall fire only diesel fuel. [MEDEP Chapter 140, BPT]
- B. The diesel fuel fired in the SICE unit shall not exceed a sulfur content of 0.05% by weight. [MEDEP Chapter 140, BPT] **Enforceable by State-Only**
- C. Diesel fuel use records shall be maintained indicating the quantity of fuel purchased (gallons) and the percent (%) sulfur content of the fuel by weight, demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT] **Enforceable by State-Only**
- D. The SICE unit shall not exceed 500 hours per year of operation (12-month rolling total). An hour meter shall be installed on the unit, and a written log shall be kept detailing hours of operation. [MEDEP Chapter 138, NO_x RACT]
- E. The SICE unit shall not exceed 30% opacity on a six (6) minute block average, for more than two (2) six (6) minute block averages in a 3-hour period. [MEDEP Chapter 140, BPT]

(24) **Process Equipment Emitting Particulate Matter**

- A. FMC BioPolymer shall operate and maintain baghouses for particulate matter control on the following:
1. Emission Unit #1, Lime Unloading
 2. Emission Unit #3, Weed Cleaning –Shredders, Screen, Conveyers, Bins
 3. Emission Unit #4, Perlite Unloading
 4. Emission Unit #8, Grinder Feed System
 5. Emission Unit #9, A44 Grinder System

6. Emission Unit #10, ACM 60 Grinder System
 7. Emission Unit #11, Tote Dumper System
 8. Emission Unit #12, Blending Product Conveyor System
 9. Emission Unit #13, Blending Area and Vacuum Systems
 10. Emission Unit #14, Off Line Feeding Systems
 11. Emission Unit #15, ACM-10 Fine Grinding
 12. Emission Unit #16, Specialty Blender
 13. Emission Unit #18, Agarose Grinding
- [MEDEP Chapter 140, BPT]

- B. Visible emissions from the baghouses on each of the sources in condition 24(A) shall not exceed 10% opacity on a six (6) minute block average basis, except for no more than one six-minute block average in any one-hour period. [MEDEP Chapter 140, BPT]
- C. FMC BioPolymer shall take corrective action if visible emissions from the baghouses exceed 5% opacity. [MEDEP Chapter 140, BPT] **Enforceable by State-Only**
- D. FMC BioPolymer shall maintain a log documenting all equipment malfunctions and all maintenance on each baghouse. FMC BioPolymer shall keep a log documenting the location, date, and nature of all bag failures. A bag failure or other malfunction of a baghouse shall be a violation only if the limits in paragraph B of this condition are exceeded. [MEDEP Chapter 140, BPT]
- E. FMC BioPolymer shall operate broken bag alarms on all baghouses in paragraph A of this condition. [MEDEP Chapter 140, BPT]

(25) **Emission Unit #5, Tank Vent Filtration System**

- A. FMC BioPolymer shall operate and maintain a wet cyclone for control of Perlite emissions from the tank vent filtration system. [MEDEP Chapter 140, BPT]
- B. Visible emissions from the cyclone shall not exceed 20% opacity on a six (6) minute block average basis. [MEDEP Chapter 140, BPT]
- C. FMC BioPolymer shall maintain a log documenting all equipment malfunctions and all maintenance on the cyclone. The log shall include the date and nature of all cyclone malfunctions. [MEDEP Chapter 140, BPT]

(26) **Process Equipment Emitting VOC and HAP emissions**

- A. FMC BioPolymer shall operate and maintain a carbon fixed bed absorber and packed absorption tower (a vacuum dryer scrubber) for VOC control on the Hydrocolloids Isopropanol Process (Emission Unit #6).
- B. FMC BioPolymer shall operate and maintain a packed absorption tower for VOC control on the Agarose Isopropanol Process (Emission Unit #17).
- C. FMC BioPolymer shall maintain and operate scrubber media flow monitors on the packed absorption towers for the hydrocolloids line, the agarose line and the pilot plant. FMC BioPolymer shall monitor condensate temperature for the carbon adsorption system. [MEDEP Chapter 134, VOC RACT]
- D. FMC BioPolymer shall maintain a log documenting all equipment malfunctions and all maintenance on the carbon fixed bed absorbers, packed tower absorbers, and vacuum dryer scrubber. Each log shall include the date and nature of all control equipment malfunctions. [MEDEP Chapter 140, BPT]
- E. Each of the four scrubber flow monitors (two packed towers for the hydrocolloids line, the packed tower for the agarose line, and the packed tower for the pilot plant) shall record media flow rate at a minimum of once per shift when the process is in operation. The condensate temperature monitor for the Hoyt carbon adsorption system shall record the condensate temperature at a minimum of once per shift when the process is in operation. The minimum media flow rate for the rotary screen wet scrubber shall be five gallons per minute. The minimum media flow rate for the vacuum dryer wet scrubber shall be two gallons per minute. The minimum media flow rate for the agarose wet scrubber shall be two gallons per minute. The maximum Hoyt condensate temperature shall be 160 degrees F.

(27) **Pilot Plant**

- A. VOC emissions from the Pilot Plant shall be limited to 8.4 lb/hr and 27.6 tons per year. [MEDEP Chapter 134, VOC RACT]
- B. The scrubber media flow shall be maintained at a minimum of 3.0 gallons per minute. [MEDEP Chapter 134, VOC RACT]

(28) **VOC RACT for the Hydrocolloids, Agarose Lines and Pilot Plant**

- A. FMC BioPolymer shall operate and maintain capture and control devices including the Hoyt carbon absorption system and two packed absorption towers for the hydrocolloids line, the packed absorption tower for the agarose line and the packed absorption tower for the pilot plant such that total

facilitywide VOC emissions do not exceed 15% of the uncontrolled VOC emissions, as determined under paragraph F of this condition. [MEDEP Chapter 134, VOC RACT]

- B. FMC shall maintain records of the amount of Isopropanol (IPA) used, purchased, and lost to wastewater. [MEDEP Chapter 134, VOC RACT]
- C. FMC BioPolymer shall monitor the media flow to the Hoyt carbon absorption system, the wet scrubber, the packed tower scrubber and the agarose wet scrubber. Media flowrates shall be recorded once per shift during process operations. For the Hoyt carbon adsorption system, FMC BioPolymer shall monitor the condensate temperature and record the value once per shift when the process is in operation. A log shall be maintained and made available to the Department upon request.
- D. FMC BioPolymer shall maintain records of IPA purchased annually, daily 24-hour wastewater composite analysis and the amount of IPA used in coagulation, and the amount of IPA in inventory at the beginning and end of each month. Material balances shall be calculated from these records as set forth in paragraph E of this condition to demonstrate and document compliance of 85% control efficiency for total facility VOC emissions.
- E. FMC shall achieve facility-wide VOC control efficiency of 85% or greater on a calendar monthly basis. FMC BioPolymer shall perform monthly mass balance calculations to demonstrate VOC control on a 12-month rolling average. Compliance with this requirement shall be determined using the following formula:

$$\text{VOC Control Efficiency \%} = \frac{\text{Total IPA Usage}^{(1)} - \text{Total VOC Emissions}^{(2)}}{\text{Total IPA Usage}^{(1)}} \times 100$$

Where:

$$\text{Total IPA usage}^{(1)} = (\text{Total measurement flow}) \times (0.8)$$

$$\text{Total VOC Emissions}^{(2)} = \text{IPA lost}^{(2)(A)} - \text{IPA discharged to waste water}^{(2)(B)}$$

$$\text{IPA Lost}^{(2)(A)} = \text{Gallons purchased} + \text{beginning inventory gallons} - \text{ending inventory gallons}$$

$$\text{IPA discharged to waste water}^{(2)(B)} = \text{IPA measured in still bottoms in the wastewater, as determined using a gas chromatograph and extrapolation.}$$

[MEDEP Chapter 134, VOC RACT]

(29) **Parts Washer**

FMC BioPolymer shall operate parts washers in accordance with MEDEP Chapter 130, which includes, but is not limited to the following: label the parts washer with operational standards, equip the washer with cover if vapor pressure >15 mmHG at 100°F, close cover when not in use, drain parts for 15 seconds or longer, shall not degrease porous material, keep drafts <40 m/minute, repair leaks, and keep records of solvent added and removed. [MEDEP Chapter 130]

(30) **Stack Testing**

A. All stack testing programs shall comply with all of the requirements of the MEDEP Compliance Test Protocol and with 40 CFR Part 60, as appropriate, or other methods approved by the MEDEP and EPA to test. [MEDEP Chapter 140, BPT]

B. FMC shall conduct stack emission testing or opacity observation testing, and demonstrate compliance with the applicable standard, on any of the following sources within 60 days after receipt of notice from the Bureau of Air Quality:

- a. Boiler #3 b. Boiler #4 c. Boiler #5

[MEDEP Chapter 140, BPT]

C. FMC shall conduct particulate matter testing (EPA Method 5) and demonstrate compliance with emission standards once during the term of this license, within one year of date of issuance on Boiler #3. [MEDEP Chapter 140, BPT]

(31) FMC BioPolymer shall comply with the following:

A. Recordkeeping

For all of the recordkeeping, required by this license, the licensee shall maintain records of the most current six-year period. [MEDEP Chapter 140]

1. The following records shall be maintained for the boilers:

- a. Annual #6 fuel oil use indicating the quantity of fuel consumed (gallons), the percent (%) sulfur content of the fuel by weight, and the heat content of the fuel demonstrated by purchase receipts from the supplier and by fuel gauges on the fuel tank; and

2. Records shall be maintained showing the annual information for the annual boiler tune-ups.

(32) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due July 30th, 2002.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(33) **Annual Compliance Certification**

FMC shall submit an annual compliance certification to the Department in accordance with Condition (20) of this license. The initial annual compliance certification is due January 31st, 2003 with the submittal of the second semiannual report after the signature date of this license. [MEDEP Chapter 140]

(34) **A. Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted by September 1.

B. Biennial Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall report every two years (1996,1998,etc.) to the Department the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

**FMC BioPolymer
Knox County
Rockland, Maine
A-366-70-A-I**

) **Departmental**
) **Findings of Fact and Order**
) **Part 70 Air Emission License**
25

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted no later than September 1.

(35) **Parameter Monitors**

Each parameter monitor must keep accurate and reliable data. Parameter monitors at FMC BioPolymer include four scrubber flow monitors for the four packed towers (two packed towers for the hydrocolloids line, the packed tower for the agarose line, and the packed tower for the pilot plant) and the condensate temperature monitor for the Hoyt carbon adsorption system. If a parameter monitor allows the recording of accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

(36) The licensee is subject to the following State regulations listed below.

<i>Origin and Authority</i>	<i>Requirement Summary</i>
Chapter 101	Visible Emissions Regulation
Chapter 102	Open Burning
Chapter 103	Fuel Burning Equipment Particulate Emission Standard
Chapter 105	General Process Source Particulate Emission Standard
Chapter 106	Low Sulfur Fuel
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques
Chapter 118	Gasoline Dispensing Facilities Vapor Control
Chapter 130	Solvent Degreasers
Chapter 134	VOC RACT
Chapter 137	Emission Statements
Chapter 138	NOx RACT

(37) The licensee is subject to the following Federal regulations listed below.

<i>Origin and Authority</i>	<i>Requirement Summary</i>
40 CFR Part 61, Subpart M	Compliance for demolition, reduction, waste disposal activities involving asbestos.
40 CFR Part 82, Subpart F	Recycling and Emissions Reduction for Protection of Stratospheric Ozone; Industrial process and commercial refrigeration units and chillers with more than 50 lbs of ozone depleting substances must: repair leaks within 30 days of discovery if leak rate exceeds 35%/ 12 months; follow technical and equipment certification requirements; keep records; HVAC units for comfort cooling with charges of more than 50 lbs must: repair leaks within 30 days of discovery if leak rate exceeds 15%/12 months; follow technical and equipment certification requirements; keep records.

(38) **Certification by a Responsible Official**

All reports (including deviation reports, quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(39) This term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2002.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 22, 1997

Date of application acceptance: October 27, 1997

Date filed with the Board of Environmental Protection _____

This order prepared by Elisha McVay, Bureau of Air Quality.